

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**NOTICE OF MOTION TO DISMISS THE INDICTMENT
OR IN THE ALTERNATIVE FOR A BILL OF PARTICULARS**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated November 16, 2018, the Declaration of Kathleen E. Cassidy, dated November 16, 2018, and the exhibit appended thereto, Defendants Clare Bronfman, Kathy Russell, and Nancy Salzman move this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the Superseding Indictment or, in the alternative, directing the government to provide a bill of particulars, and for such other and further relief as the Court may deem proper.

Dated: November 16, 2018
New York, New York

/s/ Justine Harris

Justine Harris
Amanda Ravich
Sher Tremonte LLP
90 Broad Street, 23rd Floor
New York, New York 10004
(212) 202-2600

Attorneys for Defendant Kathy Russell

/s/ Robert Soloway

David Stern
Robert Soloway
Rothman, Schneider, Soloway & Stern, LLP
100 Lafayette Street, Suite 501
New York, New York 10013
(212) 571-7700

Attorneys for Defendant Nancy Salzman

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro
Fabien M. Thayamballi
Shapiro Arato LLP
500 Fifth Avenue, 40th Floor
New York, New York 10110
(212) 257-4880

Susan Necheles
Kathleen E. Cassidy
Hafetz & Necheles LLP
10 East 40th Street, 48th Floor
New York, New York 10016
(212) 997-7400

Attorneys for Defendant Clare Bronfman